

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of:

KOBEH, Gerardo, et al.

Serial No.: 10/673,431

Filed: September 30, 2003

For: GRANTS MANAGEMENT SYSTEM

Examiner: Zecher, Michael R.

Art Unit: 3691

**APPEAL BRIEF**

Mail Stop Appeal Brief - Patents  
Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Sir:

Appellants submit this appeal brief in the above-referenced application. A notice of appeal was filed on October 31, 2008. A pre-appeal brief request for review was also filed on October 31, 2008. A Notice of Panel Decision from Pre-Appeal Brief Review, mailed November 26, 2008, held that the application remains under appeal.

**REAL PARTY IN INTEREST**

SAP Aktiengesellschaft (SAP) of Walldorf, Germany, is the real party in interest for all issues related to this application. SAP owns this patent application by assignment.

**RELATED APPEALS OR INTERFERENCES**

There are no other prior or pending appeals, interferences or judicial proceedings known by the undersigned, or believed by the undersigned to be known to Appellant or the assignee, SAP, 'which may be related to, directly affect or be directly affected by or have a bearing on the Board's decision in the pending appeal.'

**STATUS OF CLAIMS**

This application contains claims 1-27, all of which stand rejected.

A. Claims 1-10, 13-18, 20, and 22-27 were rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Pat. Pub. No. 2002/0120538 to Carrie et al. ("Carrie"), in view of U.S. Patent App. Pub. No. 2005/0192826 ("Kanefsky").

B. Claims 11, 19 and 21 were rejected under 35 U.S.C. § 103(a) as unpatentable over Corrie in view of Kanefsky, and in further view of Official Notice.

C. Claim 12 was rejected under 35 U.S.C. § 103(a) as unpatentable over Corrie and Kanefsky, and in further view of U.S. Patent No. 7,111,010 to Chen et al. ("Chen").

All rejections are appealed in this brief.

### **STATUS OF AMENDMENTS**

Responsive to a Final Office Action mailed August 1, 2008, Applicants submitted a Response to the Final Office Action under 37 C.F.R. § 1.116 on September 30, 2008, which contains no amendment to claims.

It is understood for purposes of the appeal that any Amendments to date have already been entered by the Examiner.

### **SUMMARY OF CLAIMED SUBJECT MATTER**

The subject matter of the current pending claims relates to a method and system for managing for a recipient a plurality of grants received from a plurality of grant sponsors, (*see, e.g.*, the Specification, pages 1-3, paragraphs 1, 2, 5, and 11).

The present invention might best be understood in view of the following example. Consider a recipient organization, e.g., a university, that receives grants or funding from multiple grantors, e.g., federal government agencies, state agencies, industrial companies, and foundations. For each grant, a grantor may impose certain requirements and limitations that specify how the grant may be expended. On the other hand, the daily expenditures during the course of operation at the university may be run on a transaction system, e.g., an enterprise management system. Upon receiving an expenditure request from, e.g., a professor, the transaction system may need to select a grant based on requirements and limitations from the multiple grants available to the university to fulfill the expenditure request. The present

invention is directed to a grant management system that is capable of managing expenditure transactions of a grantee organization in accordance with requirements of multiple grants awarded to the grantee.

### **Claim 1**

The presently pending independent claim 1 is directed to a computer-implemented grants management method for managing a plurality of grants for a recipient received from a plurality of grant sponsors, (*see, e.g.*, the Specification, pages 1-4, paragraphs 1, 2, 5, 11, and 15). The method recites responsive to a transaction request and data associated therewith, converting values of the associated data from a domain of a transaction system to a domain defined for one of the plurality of grants, (*see, e.g.*, the Specification, page 5, paragraph 16, page 6, paragraph 22, and FIGS. 1 and 3)(" The interpretation logic 170 may convert transaction data from a domain of the transaction processing system 130 to a domain of a grant. In the foregoing examples, while the university's transaction processing system 130 may use U.S. dollars for currency values, to determine whether a transaction can be admitted under Sponsor A's grant, the interpretation logic 170 may convert financial values to Euros").

The method of claim 1 further recites determining if the converted data maps to a classification that has been defined under the one of the plurality of grants to be valid, (*see, e.g.*, the Specification, page 5, paragraph 17 and page 7, paragraph 24). If so, the method recites determining, based on a set of rules derived from administrative and financial requirements of the plurality of grants and encoded in a database, if the converted data causes a limit defined under the one of the plurality of grants to be exceeded, (*see, e.g.*, the Specification, page 2, paragraph 11, page 5, paragraph 18, and page 7, paragraph 25). In the case that the limit is not exceeded, the method provides admitting the requested transaction; otherwise, the method recites rejecting the requested transaction, (*see, e.g.*, the Specification, page 5, paragraphs 17 and 18, page 7, paragraphs, 23 and 24, and FIGS. 1 and 3)(" The AVC manager 190 may cause a transaction to be rejected, even if the transaction maps to a valid category under the grant, if the transaction would cause a limit defined for the grant to be exceeded.").

### **Claim 6**

The presently pending independent claim 6 is directed to an enterprise management system\_for managing a plurality of grants for a recipient received from a plurality of grant sponsors, (*see, e.g.*, the Specification, pages 1-4, paragraphs 1, 2, 5, 11, and 15). The system of claim 6 includes a transaction management system, operating under a predetermined set of transaction rules and responsive to a transaction request by validating and accepting the transaction, (*see, e.g.*, the Specification, page 3, paragraph 13, and FIG. 1, 130)(" The transaction processing system 130 may include a transaction logic 140, and a transaction database 150. The transaction logic 140 may receive transaction requests from operators at various terminals (e.g., 110) and process the transaction request according to transaction rules.").

The system of claim 6 further recites a grants management system provided in communication with the transaction system, (*see, e.g.*, the Specification, page 3, paragraph 14, and FIG. 1). The grant management system of claim 6 further includes an interpretation logic unit to convert values of the transaction request from a domain of the transaction system to a domain defined for grant identified from the plurality of grants, (*see, e.g.*, the Specification, page 5, paragraph 16, and FIG. 1, 170), a dimensional control unit to determine if the converted data maps to a classification that has been defined under the grant to be valid, (*see, e.g.*, the Specification, page 5, paragraph 17, and FIG. 1, 180), an availability control unit to determine, based on a set of rules derived from administrative and financial requirements of the plurality of grants and encoded in a database, if the converted data would cause a limit defined under the grant to be exceeded, (*see, e.g.*, the Specification, page 5, paragraph 18, and FIG. 1, 190), and a database storing converted transaction of the transaction requests that map to valid classifications that do not exceed the defined limits, (*see, e.g.*, the Specification, pages 5-6, paragraphs 18-20, and FIGS. 1 and 2).

### **Claim 10**

The presently pending independent claim 10 relates to an enterprise management system for managing a plurality of grants for a recipient received from a plurality of grant sponsors, (*see, e.g.*, the Specification, pages 1-3, paragraphs 1, 2, 5, and 11). The system of claim 10 includes a transaction management system, operating under a predetermined set of

transaction rules and responsive to a transaction request by validating and accepting the transaction, (*see, e.g.*, the Specification, page 3, paragraph 13, and FIG. 1, 130)(“ The transaction processing system 130 may include a transaction logic 140, and a transaction database 150. The transaction logic 140 may receive transaction requests from operators at various terminals (e.g., 110) and process the transaction request according to transaction rules.”).

The system of claim 10 further includes a grants management system provided in communication with the transaction system, (*see, e.g.*, the Specification, page 3, paragraph 14, and FIG. 1). The grants management system is, responsive to the transaction request, further configured for (1) converting values of the transaction request from a domain of the transaction system to a domain defined for grant\_identified from the plurality of grants, (*see, e.g.*, the Specification, page 5, paragraph 16, page 6, paragraph 22, and FIGS. 1 and 3), (2) determining if the converted data maps to a classification that has been defined under the grant to be valid, (*see, e.g.*, Id.), (3) if so, determining, based on a set of rules derived from administrative and financial requirements of the plurality of grants and encoded in a database, if the converted data causes a limit defined under the grant to be exceeded, and (4) causing the transaction management system to reject to requested transaction if the limit is exceeded, (*see, e.g.*, the Specification, page 5, paragraphs 17 and 18, page 7, paragraphs, 23 and 24, and FIGS. 1 and 3)(“ The AVC manager 190 may cause a transaction to be rejected, even if the transaction maps to a valid category under the grant, if the transaction would cause a limit defined for the grant to be exceeded.”).

### **Claim 13**

The presently pending independent claim 13 relates to a computer-implemented grants management method for managing a plurality of grants for a recipient received from a plurality of grant sponsors, (*see, e.g.*, the Specification, pages 1-3, paragraphs 1, 2, 5, and 11). The method of claim 13 recites receiving a transaction request and data associated with the transaction request from a transaction management system of a grant recipient, (*see, e.g.*, the Specification, page 5, paragraph 16, page 6, paragraph 22, and FIGS. 1 and 3). The method of claim 13 further recites determining, based on a set of rules derived from administrative and financial requirements of the plurality of grants and encoded in a database, if the transaction request satisfies the rules imposed by the sponsor, (*see, e.g.*, the Specification, page 5,

paragraph 16, page 6, paragraph 22, and FIGS. 1 and 3). If so, the method recites admitting the transaction request; otherwise, rejecting the transaction request, (*see, e.g.,* the Specification, page 5, paragraphs 17 and 18, page 7, paragraphs, 23 and 24, and FIGS. 1 and 3).

#### **Claim 20**

The presently pending independent claim 20 relates to a computer-implemented reporting and billing management method for managing a plurality of grants for a grantee received from a plurality of grant sponsors, (*see, e.g.,* the Specification, page 9, paragraph 30, and FIG. 1). The method of claim 20 recites determining on a grants management system of the grantee if a report and/or a bill are due according to a predetermined set of reporting and billing rules imposed by a sponsor of a grant on the grantee, (*see, e.g.,* Id.)(" the GM system also may provide for a flexible billing/reporting tool to satisfy various sponsor requirements."). The method of claim 20 further recites retrieving transactional data stored in the sponsor's terms from a transaction management system of the grantee, (*see e.g.,* the Specification, page 9, paragraph 31). The method of claim 20 still further recites if the report and/or the bill are determined to be due, generating the report and/or the bill in the sponsor's terms, (*see e.g.,* the Specification, page 9, paragraph 32)(" some grants may specify that reporting and/or billing is to be performed only after certain milestones are achieved pursuant to a grant.").

#### **Claim 23**

The presently pending independent claim 23 relates to an enterprise management system for managing a plurality of grants for a grantee received from a plurality of grant sponsors, (*see, e.g.,* the Specification, pages 1-3, paragraphs 1, 2, 5, and 11). The system of claim 23 recites a transaction management system, operating under a predetermined set of transaction rules imposed by a sponsor on the grantee and responsive to a transaction request by validating and accepting the transaction, (*see, e.g.,* the Specification, page 9, paragraph 30, and FIG. 1, 130). The system of claim 23 further recites a grants management system of the grantee provided in communication with the transaction system, to determine if the transaction request satisfies the predetermined set of transaction rules imposed by the sponsor, and if so, storing transaction data, (*see, e.g.,* the Specification, page 9, paragraph 30, and FIG. 1, 160), where the grants management system includes a reporting and billing manager to generate a report and/or a bill to the sponsor pursuant to a predetermined set of reporting and billing rules

and the transaction data, (*see, e.g.*, the Specification, page 9, paragraphs 30 and 31, and FIG. 1).

### **Claim 27**

The presently pending independent claim 27 relates to an enterprise management system for managing grants for a grantee received from grant sponsors, (*see, e.g.*, the Specification, pages 1-3, paragraphs 1, 2, 5, and 11). The system of claim 27 includes a transaction management system operating under a predetermined set of transaction rules and responsive to a transaction request by validating and accepting the transaction, (*see, e.g.*, the Specification, page 3, paragraph 13, and FIG. 1, 130).

The system of claim 27 further includes a grants management system provided in communication with a transaction system, (*see, e.g.*, the Specification, page 3, paragraph 14, and FIG. 1). The grant management system of claim 27 further includes an interpretation logic unit to convert values of the transaction request from a domain of the transaction system to a domain defined for an identified grant, (*see, e.g.*, the Specification, page 5, paragraph 16, and FIG. 1, 170), a dimensional control unit to determine if the converted data maps to a classification that has been defined under the grant to be valid, (*see, e.g.*, the Specification, page 5, paragraph 17, and FIG. 1, 180), an availability control unit to determine, based on the predetermined set of transaction rules, if the converted data would cause a limit defined under the grant to be exceeded, (*see, e.g.*, the Specification, page 5, paragraph 18, and FIG. 1, 190), a database storing converted transaction of the transaction requests that map to valid classifications that do not exceed the defined limits, (*see, e.g.*, the Specification, pages 5-6, paragraphs 18-20, and FIGS. 1 and 2), and a reporting and billing manager to submit a report and/or a bill according to a predetermined set of rules, (*see, e.g.*, the Specification, page 9, paragraphs 30 and 31, and FIG. 1).

### **GROUND OF REJECTION TO BE REVIEWED ON APPEAL**

Whether claims 1-10, 13-18, 20, and 22-27, which stand rejected under 35 U.S.C. § 103(a), are unpatentable, over U.S. Pat. Pub. No. 2002/0120538 to Carrie et al. ("Carrie"), in view of U.S. Patent Application Publication No. 2005/0192826 ("Kanefsky").

Whether claims 11, 19, and 21, which stand rejected under 35 U.S.C. § 103(a), are unpatentable over Corrie, in view of Kanefsky, and in further view of Official Notice.

Whether claim 12, which stands rejected under 35 U.S.C. § 103(a), is unpatentable over Corrie, in view of Kanefsky, and in further view of U.S. Patent No. 7,111,010 to Chen et al. ("Chen").

## **ARGUMENT**

### **A. The Rejections of Claims 1-10, 13-18, 20, and 22-27 under 35 U.S.C. 103(a) Must Be Reversed**

To reject a claim under 35 U.S.C. § 103(a), the Office bears the initial burden of presenting a *prima facie* case of obviousness. *In re Rijckaert*, 9 F.3d 1531, 1532, 28 U.S.P.Q.2d 1955, 1956 (Fed. Cir. 1993). To establish *prima facie* obviousness, several criteria must be satisfied. First, there must be some suggestion or motivation to modify or combine reference teachings. *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q.2d 1596 (Fed. Cir. 1988). This teaching or suggestion to make the claimed combination must be found in the prior art and not based on the application disclosure. *In re Vaeck*, 947 F.2d 488, 20 U.S.P.Q.2d 1438 (Fed. Cir. 1991). As clearly indicated by the Supreme Court, it is "important to identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the [prior art] elements" in the manner claimed. *See KSR Int'l Co. v. Teleflex, Inc.*, 127 S. Ct. 1727 (2007). In this regard, the Supreme Court further noted that "rejections on obviousness cannot be sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness." *Id.*, at 1396. Second, there must be a reasonable expectation of success. *In re Merck & Co., Inc.*, 800 F.2d 1091, 231 U.S.P.Q. 375 (Fed. Cir. 1986). Third, the prior art reference(s) must teach or suggest all of the claim features. *In re Royka*, 490 F.2d 981, 180 U.S.P.Q. 580 (C.C.P.A. 1974).

Of course, an Examiner's rejections cannot stand if the art relied upon is not prior art at all. The 35 U.S.C. 102(e) critical reference date of a U.S. application publication is entitled to the benefit of the filing date of a provisional application only **if** the provisional application properly supports the subject matter relied upon to make the rejection in compliance with 35 U.S.C. 112, first paragraph. M.P.E.P. 2136.03 III.



### **1. The Kanefsky Reference Is Not a Proper Prior Reference**

Claims 1-10, 13-18, 20, and 22-27 were rejected under 35 U.S.C. § 103(a) as unpatentable over Carrie, in view of Kanefsky, U.S. Patent Application Publication No. 2005/0192826, filed August 20, 2004 ("the Kanefsky 2004 filing"). However, the combination of Carrie and the Kanefsky 2004 filing does not render claims 1-10, 13-18, 20, and 22-27 unpatentable under 35 U.S.C. § 103(a) because the Kanefsky 2004 filing is not prior art under 35 U.S.C. § 103(a)/102(e).

The the Kanefsky 2004 filing is a published application that was filed after the present application's filing date. In the Final Office Action, the Examiner asserted the Kanefsky 2004 filing benefits from the effective filing date of its provisional application, which was filed on August 21, 2003 ("Kanefsky's Provisional"). Kanefsky's Provisional, however, does not disclose the same subject matter as the Kanefsky 2004 filing. In particular, it does not disclose the same subject matter from the Kanefsky 2004 filing on which the Examiner's rejection are based. Accordingly, the relied on portions of the Kanefsky 2004 filing do not benefit from the priority of Kanefsky's Provisional and are not prior art against the pending claim.

Table 1 below shows a timeline of relevant filing dates:

DOCUMENTS	DATES
Kanefsky's Provisional filing date:	August 21, 2003
The Present Application filing date:	September 30, 2003
Kanefsky, U.S. Publ'n. 2005/0192826 filing date:	August 20, 2004

Table 1.

As explained below, Kanefsky's Provisional does not provide § 112, first paragraph support for the subject matter relied upon from the Kanefsky 2004 filing and, therefore, the Kanefsky 2004 filing is not prior art to the pending claims of the present application.

Consider claim 1, for example. In his rejection, the Examiner admits that the primary reference, Carrie, does not disclose the feature of a computer-implemented grants management method for managing a plurality of grants for a recipient received from a plurality of grant sponsors or grantors. The Examiner asserted that the Kanefsky 2004 filing discloses this subject matter at Fig. 1 and in the text at ¶ 21. However, Kanefsky's Provisional **does not**

***provide this disclosure*** at all. For example, Kanefsky's Provisional does not include any figure that matches the Fig. 1 or any text that matches ¶ 21 of the Kanefsky 2004 filing.

Indeed, any reading of Kanefsky's Provisional does not support the relied on subject matter allegedly contained in the Kanefsky 2004 filing. The Kanefsky's Provisional is merely concerned with a grant reporting system for a Grantor. For example, in its background section, Kanefsky's Provisional makes clear it intends to address the problem of how each of Federal Grantor organizations handles the reporting task for the Grantor. However, it does not disclose a grant management system for a recipient (Grantee) to manage the expenditure of grants from multiple Grantors.

Furthermore, in his rejection, the Examiner admits that Carrie does not disclose the feature of determining if the converted data maps to a domain defined for one of the plurality of grants to be valid recited in claim 1. The Examiner asserted the text in ¶ 33 of the Kanefsky 2004 filing as allegedly disclosing the feature. However, Kanefsky's Provisional ***does not provide this disclosure*** at all. The text in ¶ 33 of the Kanefsky 2004 filing is merely concerned with a description of the corresponding Fig. 4 therein. However, any reading of Kanefsky's Provisional does not contain a matching Fig. 4 or describe a system as illustrated in Fig. 4 of the Kanefsky 2004 filing. Therefore, the subject matter relied upon by the Examiner as allegedly contained in ¶ 33 of the Kanefsky 2004 filing is totally unsupported by Kanefsky's Provisional.

Applicants in a Response to the Final Office Action filed on September 30, 2008 and again in a Pre-Appeal Brief Request for Review filed on October 31, 2008 particularly pointed out the improper use of the Kanefsky 2004 filing as prior art under § 103(a)/102(e) as applied to the claims, specifically claim 1, of the present application. However, the Examiner failed to provide any explanation as to how the Kanefsky's Provisional may provide any factual support for the subject matter relied on from the Kanefsky 2004 filing. The Examiner failed the burden of presenting a *prima facie* case of obviousness.

The Examiner, in the Advisory Action, asserted M.P.E.P. 706 as the legal base and stated that "if a reference properly claims benefit under 35 U.S.C. 119(e) to a provisional application, the effective filing date is the filing date of the provisional application for any claims which fully supported under the first paragraph of 35 U.S.C. 112 by the provisional application." The

Examiner misunderstood and misapplied M.P.E.P. 706. M.P.E.P. 706 is directed to situations where a patent or patent application claims priority from its provisional application for the purpose to gain priority against prior art. However, where the Examiner tried to rely on the filing date of a provisional application of a patent or patent application to gain prior art status in rejecting pending claims such as in this case, the Examiner must show that the subject matter relied on in rejecting the pending claims is indeed supported by the provisional application as required under M.P.E.P. 2136.03 III. In the present case, there is simply no such support from Kanefsky's Provisional.

Accordingly, Kanefsky is not a proper reference to claim 1 or any of its dependent claims 2-5.

Similarly, the Examiner asserted Fig. 1 and the text in ¶¶ 22 and 33 of the Kanefsky 2004 filing in rejecting independent claims 6, 10, 20, and 27, and relied on Fig. 1 and the text in ¶ 22 of the Kanefsky 2004 filing in rejecting independent claims 13 and 23. Therefore, for the same reasons discussed above, Kanefsky is not a proper reference to claims 6, 10, 13, 20, 23, and 27 or any of their respective dependent claims 7-9, 14-18, 22, and 24-26.

Therefore, reversal of rejections to claims 1-10, 13-18, 20, and 22-27 is respectfully requested.

## **2. The Combination of Carrie and Kanefsky's Provisional Does Not Render Claims 1-10, 13-18, 20, and 22-27 Unpatentable**

As discussed above, the Examiner did not explain how Kanefsky's Provisional supports the subject matter relied on from the the Kanefsky 2004 filing. Therefore, the Examiner failed the burden of presenting a *prima facie* case of obviousness.

Furthermore, any reading of Carrie in view of Kanefsky's Provisional does not render claims 1-10, 13-18, 20, and 22-27 unpatentable.

As discussed above, independent claim 1 states in part:

a computer-implemented grants management method for managing a plurality of grants for a recipient received from a plurality of grant sponsors.

The Examiner admits that the primary reference, Carrie, does not disclose this feature. The Kanefsky's Provisional does not disclose this feature either. The Kanefsky's Provisional is merely concerned with a grant reporting system for a Grantor. For example, in its background section, Kanefsky's Provisional makes clear it intends to address the problem of how each of Federal Grantor organizations handles the reporting task. It does not disclose a grant management system for a recipient (Grantee) to manage expenditures of grants from multiple Grantors.

Further, independent claim 1 states in part:

responsive to a transaction request and data associated therewith, converting values of the associated data from a domain of a transaction system to a domain defined for one of the plurality of grants.

The Examiner admits that the primary reference, Carrie, does not disclose this feature. The Kanefsky's Provisional does not disclose this feature either. In particular, it does not disclose "a domain of a transaction system," "a domain defined for one of the plurality of grants" and converting values from the transaction system domain to grants domain. Therefore, the combination of Carrie and the Kanefsky's Provisional does not render claim 1 and its dependent claims 2-5 unpatentable. Accordingly, claims 1-5 are allowable.

Independent claims 6, 10, 13, 20, 23, and 27 and their respective dependent claims 7-9, 14-18, 22, and 24-2 includes features substantially similar to claim 1 and therefore, are allowable for the same reasons as claim 1.

### **3. The Final Office Action Did Not Consider All Elements in Claims 1-5**

M.P.E.P. 2143.03 makes it clear that the Examiner must consider all elements in a claim in examination. The Examiner failed to consider all elements of the pending claims 1-5 in the final rejection. Independent claim 1 in particular recites:

responsive to a transaction request and data associated therewith, converting values of the associated data from a domain of a transaction system to a domain defined for one of the plurality of grants.

In the Final Office Action, the Examiner first admits that the primary reference, Carrie, does not disclose the feature. However, the Examiner failed to discuss or point out any part of the secondary reference, Kanefsky, corresponds to this feature in the subsequent rejection, (see Final Office Action, pages 5-6). Applicants in the Response to Final Office Action and again in

Pre-Appeal Brief Request for Review particularly pointed out the Examiner's failure to consider the above-identified element. However, the Examiner ignored Applicant's requests for consideration of the element. Therefore, for these additional reasons, reversal of the rejections to claim 1 and its dependent claims 2-4 is respectfully requested.

**B. The Rejection of Claims 11, 19, and 21 under 35 U.S.C. 103(a) Must Be Reversed**

Claims 11, 19, and 21 depend from independent claims 10, 13, and 20, respectively and therefore, are allowable for the same reasons as claims 10, 13, and 20 since the alleged Official Notice does not cure or allege to cure the critical deficiencies of the combination of Carrie and Kanefsky.

Therefore, reversal of rejections to claims 11, 19, and 21 is respectfully requested.

**C. The Rejection of Claims 12 under 35 U.S.C. 103(a) Must Be Reversed**

Claim 12 depends from independent claim 10 and therefore, is allowable for the same reasons as claim 10 since the alleged tertiary Chen reference does not cure or allege to cure the critical deficiencies of the combination of Carrie and Kanefsky.

Therefore, reversal of rejection to claim 12 is respectfully requested.

**CLAIMS APPENDIX**

A "Claims Appendix" is attached hereto and appears on the page labeled "Claims Appendix."

**EVIDENCE APPENDIX**

No evidence has been submitted pursuant to 37 C.F.R. §§ 1.130, 1.131 or 1.132. No other evidence has been entered by the Examiner or relied upon by Appellant in the appeal. An "Evidence Appendix" is attached hereto.

**RELATED PROCEEDINGS APPENDIX**

As indicated above, there are no other appeals or interferences related to this application. As such, there are no "decisions rendered by a court or the Board in any

proceeding identified pursuant to [37 C.F.R. § 41.37(c)(1)(ii)]" to be submitted. A "Related Proceedings Appendix" is nevertheless attached hereto.

**CONCLUSION**

Applicants respectfully request reversal of the obviousness rejection to claims 1-27.

Respectfully submitted,

Date: December 29, 2008

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## **CLAIMS APPENDIX**

1. A computer-implemented grants management method for managing a plurality of grants for a recipient received from a plurality of grant sponsors, comprising:

responsive to a transaction request and data associated therewith, converting values of the associated data from a domain of a transaction system to a domain defined for one of the plurality of grants,

determining if the converted data maps to a classification that has been defined under the one of the plurality of grants to be valid,

if so, determining, based on a set of rules derived from administrative and financial requirements of the plurality of grants and encoded in a database, if the converted data causes a limit defined under the one of the plurality of grants to be exceeded, and

if not, admitting the requested transaction,

otherwise, rejecting the requested transaction.

2. The method of claim 1, wherein the domain of the transaction system and the domain of one of the plurality of grants are different.

3. The method of claim 1, wherein the domain of the transaction system is the same as the domain of the one of the plurality of grants.

4. The method of claim 1, further comprising storing the transaction data in a database in the domain defined for the one of the plurality of grants.

5. The method of claim 1, further comprising:

determining if a report and/or a bill are due according to a predetermined set of reporting and billing rules;

retrieving transactional data stored in the domain defined for the one of the plurality of grants; and

if the report and/or the bill are determined to be due, generating the report and/or the bill in the domain defined for the one of the plurality of grants.

6. An enterprise management system for managing a plurality of grants for a recipient received from a plurality of grant sponsors, comprising:
  - a transaction management system, operating under a predetermined set of transaction rules and responsive to a transaction request by validating and accepting the transaction,
  - a grants management system provided in communication with the transaction system and comprising:
    - an interpretation logic unit to convert values of the transaction request from a domain of the transaction system to a domain defined for grant identified from the plurality of grants,
    - a dimensional control unit to determine if the converted data maps to a classification that has been defined under the grant to be valid,
    - an availability control unit to determine, based on a set of rules derived from administrative and financial requirements of the plurality of grants and encoded in a database, if the converted data would cause a limit defined under the grant to be exceeded, and
    - a database storing converted transaction of the transaction requests that map to valid classifications that do not exceed the defined limits.
7. The system of claim 6, wherein the database stores the converted transaction in the domain defined for the identified grant.
8. The system of claim 6, further comprising:
  - a reporting and billing manager to generate a report and/or a bill when the report is due according to a predetermined set of reporting and billing rules.
9. The system of claim 8, wherein the reports and bills are generated in the domain defined for the identified grant.
10. An enterprise management system for managing a plurality of grants for a recipient received from a plurality of grant sponsors, comprising:
  - a transaction management system, operating under a predetermined set of transaction rules and responsive to a transaction request by validating and accepting the transaction,
  - a grants management system provided in communication with the transaction system and responsive to the transaction request by:



converting values of the transaction request from a domain of the transaction system to a domain defined for grant identified from the plurality of grants,  
determining if the converted data maps to a classification that has been defined under the grant to be valid,  
if so, determining, based on a set of rules derived from administrative and financial requirements of the plurality of grants and encoded in a database, if the converted data causes a limit defined under the grant to be exceeded, and  
causing the transaction management system to reject to requested transaction if the limit is exceeded.

11. The enterprise management system of claim 7, further comprising first and second databases, one provided for the transaction system and the other provided for the grants management system, each storing transaction data of transactions admitted by the grants management system, the transaction system's database storing the original transaction data and the grants management database storing the converted transaction data.

12. The enterprise management system of claim 10, wherein the grants management system comprises a database storing a data cube of aggregated transaction data, the data cube having dimensions for all parameters defined for all grants managed by the grants management system.

13. A computer-implemented method for managing a plurality of grants for a recipient received from a plurality of grant sponsors, comprising:

receiving a transaction request and data associated with the transaction request from a transaction management system of a grant recipient;

determining, based on a set of rules derived from administrative and financial requirements of the plurality of grants and encoded in a database, if the transaction request satisfies the rules imposed by the sponsor, and

if so, admitting the transaction request;  
otherwise, rejecting the transaction request.

14. The method of claim 13, further comprising converting the associated data to a

predetermined domain of a grant identified from the plurality of grants.

15. The method of claim 13, further comprising determining if the associated data maps to a valid budget entry for the grant.

16. The method of claim 15, further comprising rejecting the transaction request if the associated data maps to an invalid budget entry for the grant.

17. The method of claim 13, further comprising determining if the associated data is consistent with a budgetary plan.

18. The method of claim 17, further comprising rejecting the transaction request if the associated data is inconsistent with the budgetary plan.

19. The method of claim 13, wherein the administrative and financial requirements from one sponsor is different from the administrative and financial requirements from another sponsor.

20. A computer-implemented reporting and billing management method for managing a plurality of grants for a grantee received from a plurality of grant sponsors, comprising  
determining on a grants management system of the grantee if a report and/or a bill are due according to a predetermined set of reporting and billing rules imposed by a sponsor of a grant on the grantee;  
retrieving transactional data stored in the sponsor's terms from a transaction management system of the grantee; and  
if the report and/or the bill are determined to be due, generating the report and/or the bill in the sponsor's terms.

21. The method of claim 20, wherein the report and the bill are generated according to the sponsor's currency, dimension, and fiscal year.

22. The method of claim 20, further comprising using a blocking indicator to indicate whether a report and/or a bill are due.

23. An enterprise management system for managing a plurality of grants for a grantee received from a plurality of grant sponsors, comprising:

a transaction management system, operating under a predetermined set of transaction rules imposed by a sponsor on the grantee and responsive to a transaction request by validating and accepting the transaction, and

a grants management system of the grantee provided in communication with the transaction system, to determine if the transaction request satisfies the predetermined set of transaction rules imposed by the sponsor, and if so, storing transaction data, wherein the grants management system comprises:

a reporting and billing manager to generate a report and/or a bill to the sponsor pursuant to a predetermined set of reporting and billing rules and the transaction data.

24. The system of claim 23, wherein the sponsor and grantee run the grant on different terms.

25. The system of claim 24, wherein, pursuant to a predetermined set of rules imposed by the sponsor, the reporting and billing manager retrieves the transactional data stored in the sponsor's terms, and generates a report and/or bill in the sponsor's terms when it is determined to be due.

26. The system of claim 23, wherein the grants management system further comprises:  
an interpretation logic unit to convert values of the transaction request from a domain of the transaction system to a domain defined for an identified grant,

a dimensional control unit to determine if the converted data maps to a classification that has been defined under the grant to be valid,

an availability control unit to determine if the converted data would cause a limit defined under the grant to be exceeded, and

a database storing converted transaction of transaction requests that map to valid classifications that do not exceed the defined limits.

27. An enterprise management system for managing grants for a grantee received from grant sponsors, comprising:

- a transaction management system operating under a predetermined set of transaction rules and responsive to a transaction request by validating and accepting the transaction,

- a grants management system provided in communication with a transaction system wherein the transaction system comprises:

  - an interpretation logic unit to convert values of the transaction request from a domain of the transaction system to a domain defined for an identified grant,

  - a dimensional control unit to determine if the converted data maps to a classification that has been defined under the grant to be valid,

  - an availability control unit to determine, based on the predetermined set of transaction rules, if the converted data would cause a limit defined under the grant to be exceeded,

  - a database storing converted transaction of transaction requests that map to valid classifications that do not exceed the defined limits, and

  - a reporting and billing manager to submit a report and/or a bill according to a predetermined set of rules.

**EVIDENCE APPENDIX**

No evidence has been submitted pursuant to 37 C.F.R. §§ 1.130, 1.131, or 1.132. No other evidence has been entered by the Examiner or relied upon by Appellant in the appeal.

#### **RELATED PROCEEDINGS APPENDIX**

As indicated above in this Appeal Brief, “[t]here are no other prior or pending appeals, interferences or judicial proceedings known by the undersigned, or believed by the undersigned to be known to Appellant or the assignee, SAP, which may be related to, directly affect or be directly affected by or have a bearing on the Board’s decision in the pending appeal.” As such, there no “decisions rendered by a court or the Board in any proceeding identified pursuant to [37 C.F.R. § 41.37(c)(1)(ii)]” to be submitted.